

1 WRIGHT, FINLAY & ZAK, LLP
2 Jonathan D. Fink, Esq., SBN 110615
3 Nicholas G. Hood, Esq., SBN 238620
4 4665 MacArthur Court, Suite 200
5 Newport Beach, CA 92660
Tel. (949) 477-5050 / Fax (949) 477-9200
jfink@wrightlegal.net; nhood@wrightlegal.net

6 Attorneys for Defendant WEST CAPITAL LENDING, INC.
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11 WARREN INGRAM and LINDA
12 JOHNSTONE, individually and on behalf
of all others similarly situated,

13 Plaintiffs,
14 vs.

15 WEST CAPITAL LENDING, INC.

16 Defendants.

Case No. 5:22-cv-03865

**STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT**

**NO COURT ORDER REQUIRED
(L.R. 6-1(a))**

Complaint served: 07/05/2022
Current response date: 07/26/2022
New response date: 08/02/2022

21 **TO THIS HONORABLE COURT:**

22 Plaintiffs WARREN INGRAM and LINDA JOHNSTONE (collectively,
23 “Plaintiff”) and Defendant WEST CAPITAL LENDING, INC. (“Defendant”), by and
24 through their respective attorneys of record, hereby stipulate as follows:

25 1. WHEREAS, Defendant’s responsive pleading to Plaintiff’s Initial
26 Complaint is due July 26, 2022;

2. WHEREAS, respective counsel for Plaintiff and Defendant have agreed to provide a brief extension for Defendant to respond to Plaintiff's Initial Complaint; and

IT IS HEREBY STIPULATED that Defendant is granted an extension through August 2, 2022 to file its responsive pleading to Plaintiff's Initial Complaint.

WRIGHT, FINLAY & ZAK, LLP

Dated: July 26, 2022

By: /s/Nicholas Hood
Nicholas G. Hood, Esq.
Attorneys for Defendant WEST CAPITAL
LENDING, INC.

PARONICH LAW, P.C.

Dated: July 26, 2022

By: /s/ Anthony I. Paronich
Anthony I. Paronich, Esq., Pro Hac Vice
Attorneys for Plaintiffs WARREN INGRAM
and LINDA JOHNSTONE

PROOF OF SERVICE

I, Gretchen Grant, declare as follows:

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 4665 MacArthur Court, Suite 200, Newport Beach, California 92660. I am readily familiar with the practices of Wright, Finlay & Zak, LLP, for collection and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited with the United States Postal Service the same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

On July 26, 2022, I served the within STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT on all interested parties in this action as follows:

[] by placing [] the original [X] a true copy thereof enclosed in sealed envelope(s) addressed as follows:

Anthony I. Paronich, Esq.
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(517) 485-0018; Fax: (508) 318-8100
Email: anthony@paronichlaw.com
Pro Hac Vice Attorney for Warren Ing

Adam J. Schwartz, Esq.
Adam J. Schwartz, Attorney at Law
5670 Wilshire Boulevard, Suite 1800
Los Angeles, CA 90035
(323) 455-4016
Email: adam@ajschwartzlaw.com
Attorney for Warren Ingram and Linda Johnstone

- (BY MAIL SERVICE) I placed such envelope(s) for collection to be mailed on this date following ordinary business practices.
- (BY FEDERAL EXPRESS OVERNIGHT- NEXT DAY DELIVERY) I placed true and correct copies thereof enclosed in a package designated by Federal Express Overnight with the delivery fees provided for.

1 [X] (CM/ECF Electronic Filing) I caused the above document(s) to be transmitted to the
2 office(s) of the addressee(s) listed by electronic mail at the e-mail address(es) set
3 forth above pursuant to Fed.R.Civ.P.5(b)(2)(E). "A Notice of Electronic Filing
4 (NEF) is generated automatically by the ECF system upon completion of an
5 electronic filing. The NEF, when e-mailed to the e-mail address of record in the
6 case, shall constitute the proof of service as required by Fed.R.Civ.P.5(b)(2)(E). A
7 copy of the NEF shall be attached to any document served in the traditional manner
8 upon any party appearing pro se."

9 [X] (Federal) I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct.

11 Executed on July 26, 2022, at Newport Beach, California.

12 
13 Gretchen Grant